VICTOR N. PIPPINS
California State Bar No. 251953
FEDERAL DEFENDERS OF SAN DIEGO, INC.
225 Broadway, Suite 900
San Diego, California 92101-5008
Telephone: (619) 234-8467
E-mail: victor_pippins@fd.org

Attorneys for Mr. Ramirez-Barraza

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(HONORABLE JEFFREY T. MILLER)

UNITED STATES OF AMERICA, Plaintiff, v. **OSVALDO RAMIREZ-BARRAZA**, Defendant.	)	Case No. 08-CR295-JM Date: March 21, 2008 Time: 11:00 A.m. **NOTICE OF MOTION AND MOTIONS TO:** **1) COMPEL DISCOVERY** **2) DISMISS INDICTMENT** **3) SUPPRESS STATEMENTS** **4) FILE ADDITIONAL MOTIONS**

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY
PAUL L. STARITA, ASSISTANT UNITED STATES ATTORNEY

PLEASE TAKE NOTICE that on March 21, 2008, or as soon thereafter as counsel may be heard, Juan Martinez-Peralta, by and through his counsel, Victor N. Pippins and Federal Defenders of San Diego, Inc., will ask this Court to enter and order granting Mr. Ramirez-Barraza's motions in the above listed case.

//

//

//

//

//

//

MOTION

Oslvaldo Ramirez-Barraza, by and through his attorneys, Victor N. Pippins, and Federal Defenders of San Diego, Inc., hereby moves this Court to grant the following motions.

These motions are based upon the instant motion and notice of motion, the attached statements of facts and memorandum of points and authorities, and any and all other materials that may come to this Court's attention at the time of the hearing on this motion.

Respectfully submitted,

Dated: March 7, 2008

/s/ Victor N. Pippins
VICTOR N. PIPPINS
Federal Defenders of San Diego, Inc.
Attorneys for Mr. Ramirez-Barraza

VICTOR N. PIPPINS
California State Bar No. 251953
FEDERAL DEFENDERS OF SAN DIEGO, INC.
225 Broadway, Suite 900
San Diego, California 92101-5008
Telephone: (619) 234-8467
Email: Victor_Pippins@fd.org

Attorneys for Mr. Ramirez-Barraza

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(HONORABLE JEFFREY T. MILLER)

UNITED STATES OF AMERICA, Plaintiff, v. **OSVALDO RAMIREZ-BARRAZA**, Defendant.	Case No.: 08CR0247-H Date: March 21, 2008 Time: 11:00 a.m. **CERTIFICATE OF SERVICE**

Counsel for Defendant certifies that the foregoing pleading is true and accurate to the best of his information and belief, and that a copy of the foregoing document has been served this day upon:

Paul L Starita
Paul.Starita@usdoj.gov,efile.dkt.gc1@usdoj.gov

Respectfully submitted,

DATED: March 7, 2008

/s/ Victor N. Pippins
VICTOR N. PIPPINS
Federal Defenders of San Diego, Inc.
Attorneys for Mr. Ramirez-Barraza